

**PARK CITY MUNICIPAL CORPORATION**

**SOILS ORDINANCE AREA ENVIRONMENTAL MANAGEMENT SYSTEM**

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**DRAFT**

**Prepared by: Park City Municipal Corporation (PCMC)**  
445 Marsac Avenue  
P.O. Box 1480  
Park City, Utah 84060-1480  
Jeff Schoenbacher, Environmental Coordinator  
(435) 615-5058  
jschoenbacher@parkcity2002.com

**Submitted to: Utah Department Environmental Quality**  
168 North 1950 West  
Salt Lake City, UT 84114  
Mo Salam, Project Manager  
(801) 536-4282

**United States Environmental Protection Agency**  
Region 8  
999 18<sup>th</sup> Street  
Suite 500  
Denver, CO 80202  
Jim Christiansen, Project Manager  
(303) 312-6748

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## TABLE OF CONTENTS

<b>1.0</b>	<b>INTRODUCTION.....</b>	<b>3</b>
<b>2.0</b>	<b>SITE BACKGROUND.....</b>	<b>3</b>
	Figure 1 Expanded and Original Soils Ordinance Boundary .....	4
	Figure 2 Prospector Arial 9-23-87 .....	6
<b>2.1</b>	<b>EMS Objectives.....</b>	<b>6</b>
<b>3.0</b>	<b>Environmental Policy .....</b>	<b>7</b>
<b>3.1</b>	<b>Public Health and Environment .....</b>	<b>7</b>
<b>3.2</b>	<b>Utah Blood Lead Registry and Health Department.....</b>	<b>8</b>
<b>4.0</b>	<b>Soil Mitigation Compliance Program .....</b>	<b>8</b>
<b>4.1</b>	<b>Certificate of Compliance Program.....</b>	<b>9</b>
	Figure 3 Capped Lots Original Ordinance Area .....	9
	Figure 4 Capped Lots within Expanded Area .....	9
<b>4.1.0</b>	<b>Lot Types Within Ordinance Area .....</b>	<b>10</b>
<b>4.1.1</b>	<b>Chatham Hills Removal From Ordinance Area.....</b>	<b>10</b>
<b>4.1.2</b>	<b>Annual Lot Risk Assessment.....</b>	<b>11</b>
	Figure 3 Assessment Areas .....	12
<b>4.1.3</b>	<b>Assessment Areas.....</b>	<b>12</b>
<b>4.1.4</b>	<b>Assessment Components.....</b>	<b>12</b>
<b>4.1.5</b>	<b>Assessment Checklist.....</b>	<b>13</b>
<b>4.1.6</b>	<b>Assessment XRF Field Sampling.....</b>	<b>13</b>
<b>4.2</b>	<b>Soil Ordinance Resident Notices.....</b>	<b>14</b>
<b>4.3</b>	<b>Lots Without Certificate of Compliance Strategy.....</b>	<b>14</b>
<b>4.4</b>	<b>Corrective Action Loan Program.....</b>	<b>14</b>
<b>5.0</b>	<b>Education and Public Outreach.....</b>	<b>14</b>
<b>5.1.0</b>	<b>Soils Issues.....</b>	<b>15</b>
<b>5.1.1</b>	<b>Lead Type and Associated Health Risks.....</b>	<b>15</b>
<b>5.1.2</b>	<b>Residential Best Management Practices.....</b>	<b>15</b>
<b>5.1.3</b>	<b>Landscaping Specifications.....</b>	<b>15</b>
<b>5.1.4</b>	<b>Exporting Soil Characterization and Disposal Requirements.....</b>	<b>15</b>
<b>5.1.5</b>	<b>Summit County Lead Screening Services .....</b>	<b>16</b>
<b>5.2</b>	<b>Presentation Media .....</b>	<b>16</b>
<b>5.3</b>	<b>Reports on Sampling History of Lots .....</b>	<b>16</b>
<b>5.4</b>	<b>New Residents Orientation.....</b>	<b>16</b>
<b>5.5</b>	<b>Real Estate Agent Orientation.....</b>	<b>16</b>
<b>5.6</b>	<b>Renters Orientation .....</b>	<b>16</b>
<b>5.7</b>	<b>Lead Awareness Campaign to Local Physicians .....</b>	<b>17</b>
<b>6.0</b>	<b>Prospector Sampling Records and Data.....</b>	<b>17</b>
<b>6.1</b>	<b>Prospector Soil Tracking Contingencies.....</b>	<b>17</b>
	<b>Tab reference .....</b>	<b>18</b>
	Tab 1 – Robert Duprey, Director of Hazardous Waste Management Division letter dated July 28 <sup>th</sup> 1988	18
	Tab 2 – Chapter 15 Park City Landscaping and Maintenance of Soil Cover 11-15-1.....	18
	Tab 3 – Area 1 Inspection Zone and Address List .....	18
	Tab 4 – Area 2 Inspection Zone and Address List .....	18
	Tab 5 – Area 3 Inspection Zone and Address List .....	18
	Tab 6 – Area 4 Inspection Zone and Address List .....	18

# Draft

Tab 7 – Area 5 Inspection Zone and Street List.....	18
Tab 8 – Area 6 Inspection Zone and Street List.....	18
Tab 9 – EMS Inspection Checklist .....	18
Tab 10 – Resident Lot Sample Report .....	18
Tab 11 – Landscaping Specifications .....	18
Tab 12 – EPA and PCMC Educational Lead Awareness Pamphlet (Has yet to be developed).....	18
Tab 13 – Soils Ordinance Boundary Map .....	18
Tab 14 – Expanded Area Lots that have been sampled.....	18
Tab 15 – Stakeholder Distribution List.....	18

# Draft

## 1.0 INTRODUCTION:

In a cooperative effort with the Utah Department of Environmental Quality (UDEQ) and the United States Environmental Protection Agency (USEPA), Park City Municipal Corporation (PCMC) has agreed to the implementation of an Environmental Management System (EMS) to further protect human health and the environment within the Soils Ordinance Area. As a result the goal for the EMS is to define the environmental procedures, standards, education, and controls for protecting the sites long-term integrity and the residents residing within the area. To fulfill that goal the EMS is broken down into the following four functions:

- Environmental Policy
- Soil Mitigation Compliance Program
- Education and Public Outreach
- Records and Data Management Systems

The implementation of these components will represent a systematic approach that fulfills the long-term concerns of UDEQ and USEPA, while also offering a practical yet achievable program that can be administered by PCMC and the Soil Ordinance residents.

## 2.0 SITE BACKGROUND

USEPA and the UDEQ have been investigating and evaluating mine sites within the Park City area since the early 1980's. During these evaluations, Silver Creek Tailings Site now known as Prospector Square was investigated to determine the potential environmental impacts. As a result, USEPA proposed listing the Prospector Square area on the National Priorities List (NPL) in 1985. This resulted in a controversial scenario with the community, since much of Prospector Square was being developed into a residential subdivision within the city. USEPA's concerns with the development of the area were based on exposure risks of residential households being situated within an area known to contain mine tailing waste. The hazardous constituents of concern that were known to be within the mine tailing waste are lead, arsenic, and cadmium.

The proposal to list the Site on the National Priority List (NPL) generated a great deal of controversy within the community. PCMC and most city residents were opposed to NPL listing, while EPA maintained the site should be NPL listed. Furthermore, PCMC believed the situation at Prospector presented only minimal risks and could be remedied with local corrective actions resulting in the city capping vacant properties in 1985. Also, during this time, PCMC sought congressional intervention to ensure the site was not listed on the NPL. As a result, a line item was included in the 1986 SARA amendments (Section 120 pg. 666), which removed the site from consideration from the NPL and precluded future considerations to the NPL unless significant new information was discovered. The following is the language contained within the SARA amendment:

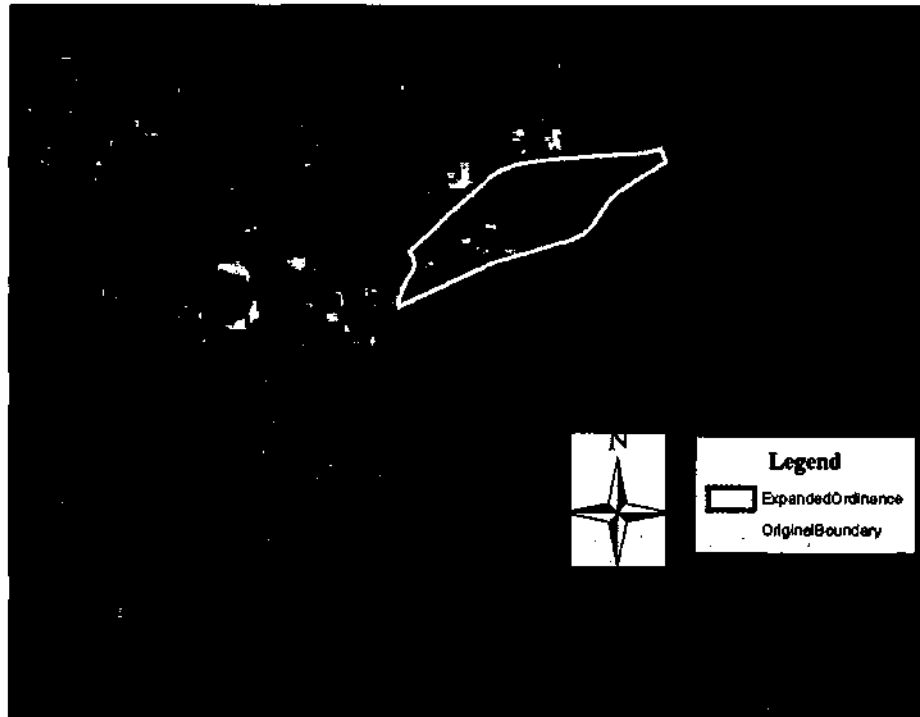
(p) SILVER CREEK TAILINGS.—Effective with the date of enactment of this Act, the facility listed in Group 7 in EPA National Priorities List Update #4 (50 Federal Register 37956, September 18, 1985), the site in Park City, Utah, which is located on tailings from noncoal mining operations, shall be deemed removed from the list of sites recommended for inclusion on the National Priorities List,

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unless the President determines upon site specific data not used in the proposed listing of such facility, that the facility meets requirements of the Hazard Ranking System or any revised Hazard Ranking System.

To allay the controversy and seek consensus based technical information regarding the situation at Prospector. PCMC, EPA, and UDEQ developed a series of scientific studies that focused on air, water, and health. These studies were very broad with ATSDR conducting the health and blood lead assessment, USEPA conducting the ambient air study, and UDEQ/USGS conducting ground and surface water quality study. While these studies were being conducted, PCMC also began developing a local ordinance to ensure effective capping of the area. These actions culminated in 1988 with two EPA letters giving qualified approval of PCMC proposal for a local ordinance (included at Tab 1) and the subsequent enacting of the ordinance.

In general, the Landscaping and Soil Maintenance Cover requirements mandated a 6-inch "clean top soil" cap for the Prospector lots. Furthermore, an action level for capping a lot was established at 1000 ppm for "existing development" and "new construction" while imported fill, has an action level of 200 ppm. The ordinance required the maintenance of vegetation and landscaping standards in order to maintain the cap and contain underlying mine related material. The general objective of these measures was to isolate potentially contaminated material from the surface and to minimize direct contact. Figure 1 represents the Expanded and Original Soils Ordinance Boundary within Park City.



**Figure 1 Expanded and Original Soils Ordinance Boundary<sup>1</sup>**

Over the years, USEPA has been reluctant to fully accept the PCMC Ordinance Strategy, though

<sup>1</sup> Tab 13 Contains the Soils Ordinance Map

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EPA has consistently given qualified approval to the approach. USEPA has kept the issue under review, due primarily to concerns with the long-term commitments of the Ordinance and a lack of strong supporting data to validate the effectiveness of the Ordinance. However, in a cooperative effort, PCMC, USEPA and others are now seeking to alleviate those concerns and further strengthen the Ordinance.

Since the inception of the ordinance program, the area has been developed and the majority of the properties have been sampled and capped. The City has also devoted a great deal of resources to the effort, which has resulted in the concept being increasingly effective at managing and enforcing the ordinance. Examples of these resources include the hiring of a full time environmental coordinator to administer the ordinance, absorbing soil sampling costs, educational resources, and computer hardware and applications for analyzing environmental trends. It should also be noted that PCMC requires Building Inspectors and Code Enforcement personnel to assist with enforcing the ordinance requirements. More importantly, property owners have spent thousands of dollars per property to install the cap and other controls to minimize the risks<sup>2</sup>. The average cost to cap a lot with minimal landscaping aesthetics is \$3,000.00 per lot, which is an expense that the property owner incurs. In addition, the Prospector Park Home Owners Association has also played a very important role in raising awareness and educating residents residing within the neighborhood. The HOA organization assists the city in enforcement and oversight for addressing issues that may arise related to cap integrity and ordinance infractions. With the full implementation of the original ordinance program, PCMC has expanded the area to encompass a larger region of the city known for historical mining activity. This area is known as Park City's "Expanded Soils Ordinance Area" and the boundaries are defined in green<sup>3</sup>.

PCMC is proposing to implement an Environmental Management System (EMS) to further strengthen the Soils Ordinance Program on a long-term basis. In order for the EMS to be successful and meet the expectations of all stakeholders, the program will have to be mutually agreed upon and contributed by all. Furthermore, PCMC and the Prospector residents recognize the EMS's obligations regarding active participation in the program if it is to be successful. It is PCMC and the residents desire with the implementation of this long-term program that the Silver Creek Tailings Site be archived from CERCLIS.

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<sup>2</sup> Figure 2 Represents an Arial Photo of Prospector (9/23/87).

<sup>3</sup> See Figure 1 for boundaries.

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Figure 2 Prospector Arial 9-23-87

## 2.1 EMS Objectives

The implementation of the EMS will seek to fulfill the following objectives:

### ➤ *Strengthen Ordinance*

Within this proposal PCMC intends to strengthen the ordinance with uniform enforcement for all properties within the soils district. This includes the identification of lots with known elevated levels of lead that have not been capped. These properties have been provided with two notices and are required to be capped by December 2003. Also defined within this proposal is making non-compliant property owners subject to Class B Criminal Misdemeanor charges and legal enforcement. In addition, PCMC also offers within this proposal property owner's with incentives such as free soil testing for site characterization and cap compliance verification. PCMC will also provide non-compliant residences an opportunity to apply for a low interest loan to assist in paying for capping each lot. Finally, the ordinance will be strengthened by instituting mandatory sampling for all lots that are not known to be capped and requiring a cap for these properties not compliant with the ordinance.

### ➤ *Annual Curb Side Risk Assessment*

The annual risk assessment is a long-term commitment to evaluate properties residing within the soils district for environmental and human health risks. The proposed assessment will be conducted on an annual basis for specific zones within the district. A component of the assessment will be conducting voluntary XRF field samples for lots that are capped within each area. The purpose of this sampling is to verify that the cap has adequately contained underlying soils that potentially could be impacted by elevated levels of heavy metals. This data will be archived and evaluated to determine if the ordinance is effective in providing a barrier between residents and the impacted soils.

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## ➤ *Public Education*

This section is intended to increase lead exposure awareness for property owners within the district and the practices that can be implemented to minimize exposure risk. Property owners will also be informed of the underlying levels of lead contained on their lot and the importance of maintaining the cap. This is an expansion of the PCMC Ordinance as it covers a broad spectrum of residents as well as outreach to local physicians.

## ➤ *Soil Disposal Assurances*

Within this EMS are controls that will be initiated for assuring soils that are being transported outside the soils district are disposed of accordingly. This will minimize the scenario of soils being disposed of improperly.

## ➤ *Annual Review and Reporting*

The EMS contains annual reporting requirements on the assessment results and reviewing the overall progress of the program after 5 years of implementation.

### **3.0 ENVIRONMENTAL POLICY**

The purpose of this section is to document PCMC position on all of the environmental issues that reside within the Soils Ordinance area. The policy set forth will support the EMS protocol and be the long-term strategy for the area in order to minimize human and environmental risks.

#### **3.1 *Public Health and Environment***

Park City acknowledges the community's vital interests in protecting its citizens' health and safety and preserving its natural resources. The City similarly wishes to address the City's environmental legacy as an historic mining community while retaining its world-class resort amenities, which are undeniably linked to the beauty, scenic attributes, and overall environmental quality of this mountain community. Park City therefore desires to become a leader in municipal environmental performance.

These goals must be integrated with other vital interests committed to by the City, including viable economic redevelopment; affordable housing; the cost-effective, safe and efficient delivery and operation of city services that meet public needs; and limited fiscal resources. To ensure that these public interests are balanced in a manner that provides the greatest opportunity for local citizen input and decision-making, the City desires to be the lead agency in responding to on-going environmental management and remediation efforts required in the area of the City, which is subject to the Park City Landscaping and Maintenance of Soil Cover Ordinance. Legal obligations in these matters are established by applicable laws and regulations; this Policy Statement is not intended to create further or additional requirements. To support the performance of the City's responsibilities and undertakings, the City Council hereby commits the City:

To implement and maintain an environmental management system that embraces all the City's responsibilities as set forth in herein and in the General Plan to protect the public health and



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environment. To comply with all environmental laws and regulations applicable to our utilities, property and public services;

- To assure that employees of the City receive training appropriate to their functions concerning the City's environmental responsibilities;
- To improve and foster communication with residents, tenants, realtors, contractors, property owners, service providers, other government agencies and other participants in the City's work program for these management practices and compliance requirements established to further the aims of this Policy Statement;
- To encourage employees and all other citizens to communicate with the City about ways to increase the effectiveness of City's practices supporting its mission of environmental stewardship;
- To make every reasonable effort to also protect the cultural and historic resources of the City.

## ***3.2 Utah Blood Lead Registry and Health Department***

PCMC position on blood lead screening and monitoring is that this task is managed adequately through the Utah Department of Health, Division of Epidemiology and Laboratory Services. Through this department a program was developed with the intent of protecting the health of Utah citizens by identifying and controlling environmental health hazards. The Utah Blood Lead Registry (UBLR) is a database containing the test results of blood lead tests performed on adults and children who live in Utah. The UBLR was started in 1990 and is currently maintained by the Health Department. Under Utah Administrative Rule 386-703 (Injury Reporting Rule), Utah laboratories performing blood lead tests are required to report the results of those tests. Currently the reportable level in Utah is 10 micrograms of lead per deciliter of blood. Originally, the UBLR received only reports on adults with elevated blood lead levels. In 1996, EEP started collecting data on children as well as adults. The UBLR is currently used in two comprehensive ongoing studies of blood lead poisoning in Utah. Since 1996, there has only been one reportable test exceedance related to PCMC that was reported to the registry, which was in the age group of 0-72 months. Furthermore, it is believed that this particular incident was related to lead base paint and not lead soils ingestion. As a result, PCMC believes that this is further validation that the ordinance is working as intended to minimize heavy metal ingestion with the residences of the community.

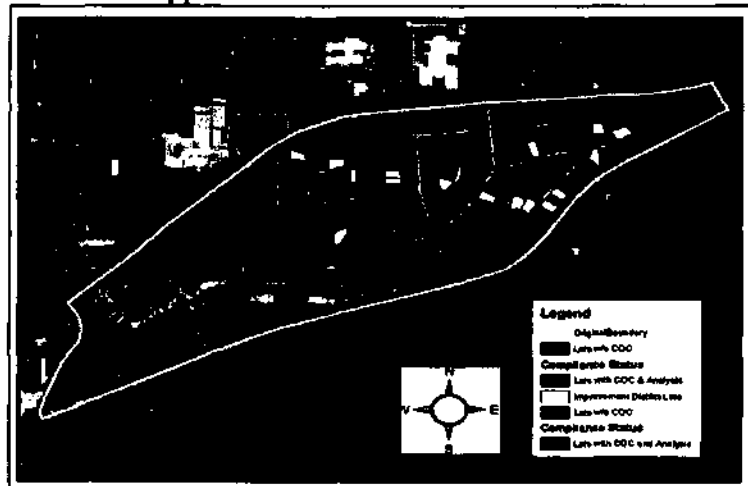
## **4.0 SOIL MITIGATION COMPLIANCE PROGRAM**

The purpose of this section is to further define PCMC commitment to the soil mitigation program and to strengthen it through additional language in order to address the long-term commitment. PCMC annual goal with the program is to pursue the objective of capping 15 lots with "clean top-soil" until all areas within the ordinance boundaries are capped. The purpose of the ordinance is to require a mandatory cap on all property within the district to isolate impacted soil from the historic mining era. Of course the primary reason for requiring the mandatory cap is to provide a barrier that adequately prevents the ingestion of soils potentially impacted with heavy metals.

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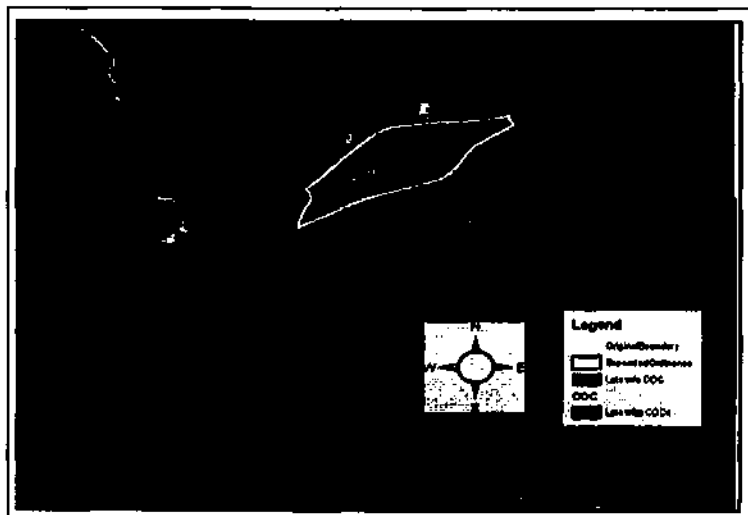
## 4.1 Certificate of Compliance Program

PCMC is seeking to cap the impacted properties within the Expanded and Original Soils Ordinance Boundaries. During this time, PCMC will offer free testing of any residential lots within the regulated area. The testing would also be available for those residents that desire to have their lot tested to determine the current compliance status of the property. Figure 3 represents lots that have been capped and remain in compliance within the original Prospector area. The lots identified in red are capped lots that have analytical results associated with the current compliance status. The remaining black lots are units that have yet to be capped or have been sampled and need to be capped.



**Figure 3 Capped Lots Original Ordinance Area**

Regarding the lots that have been currently capped within the Expanded Ordinance Area, Figure 4 represents these properties that have "Certificate of Compliance" documentation. Properties outside the boundaries identified in red, represent property owners that conducted the sampling as a precaution due to the close proximity of the boundary.



**Figure 4 Capped Lots within Expanded Area<sup>4</sup>**

<sup>4</sup> Tab 14 Contains Map "Capped Lots within Expanded Area

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## 4.1.0 Lot Types Within Ordinance Area

PCMC has inventoried all properties within the original and expanded ordinance boundaries in order to determine the total number of lots affected by the ordinance. The following table represents the number of properties residing in each area:

Area	Lot Number
Prospector Residential Lots	289
Prospector Development District	157
Expanded Ordinance Area	504
Expanded Ordinance Area Excluding Chatham	353
<b>Total Lot Number</b>	<b>950</b>

In addition the following represents the current compliance types that exist within each area:

Area	Lot Number
<b><i>Prospector Residential Area</i></b>	
• Capped lots within Prospector.	180
• Capped lots during the Improvement District.	16
• Lots needing capped by year-end 2003.	26
• Lots that have not been sampled.	67
<b><i>Prospector Development District</i></b>	
• Capped Lots	106
• Non-Capped Lots	51
<b><i>Expanded Area</i></b>	
• Capped lots	170
• Non-capped lots	353

### 4.1.1 Chatham Hills Removal From Ordinance Area

On July 10<sup>th</sup>, 2003, PCMC presented to both UDEQ and USEPA reports summarizing soil cap analysis for Chatham Crossing subdivision. The report documented 182 samples procured from this development that reflected an average lead concentration of 95.49 ppm.

During the years of 1999 to 2000 these samples represented Phase II investigations that the developer did to characterize the site. Samples taken after 2001 to present were samples intended for site characterization and validating compliance with the ordinance. Since the inception of sampling at Chatham Crossing, there have been only two exceedances (2183 & 2189 Fenchurch -1300 ppm) that surpassed the ordinance standard. As a result, these two areas were capped and re-sampled resulting in compliance. In the year of 2001 - 2003, the majority of the sampling was to determine the current compliance levels of the properties residing in the development. Meaning the properties were sampled without the introduction of topsoil, consequentially the lots having low lead levels were vegetated with native soils.

Based on this data, PCMC has concluded with USEPA and UDEQ concurring, that this area has minimal exposure risk, therefore should be removed from the ordinance area. As a result, the implementation of this EMS will result in the ordinance boundary being re-defined to exclude

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this area. Taking these properties out of the ordinance area does not negate the fact that further development of this area will have to comply with storm water management controls and construction mitigation plan requirements.

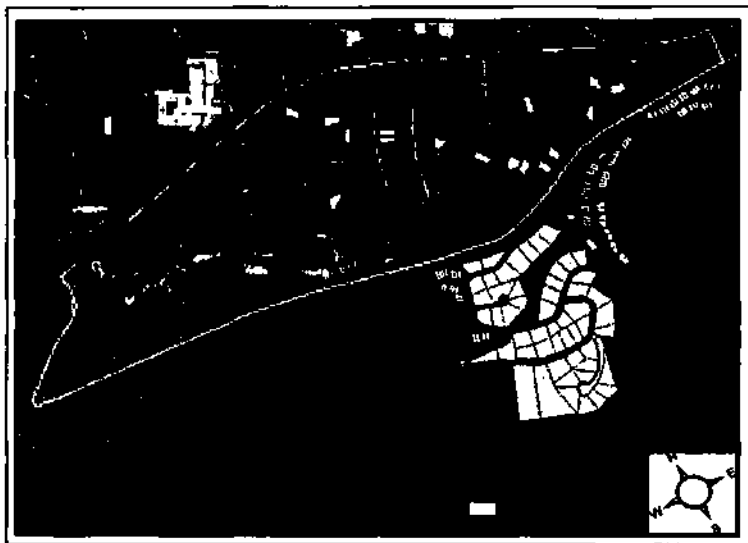
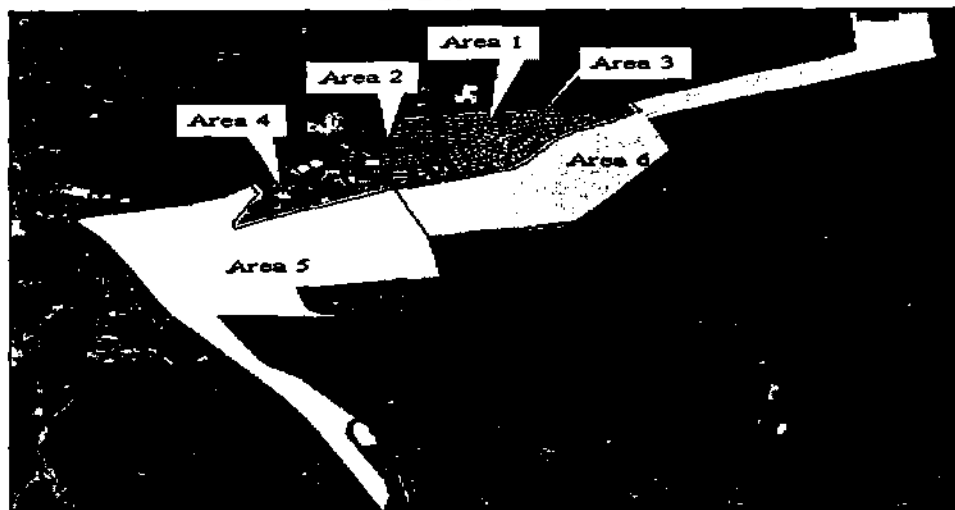


Figure 5 Chatham Hills Excluded Area

### 4.1.2 Annual Lot Risk Assessment

The purpose of the annual risk assessment is to evaluate the ordinance areas for certain human and environmental risk factors that could increase exposure. In addition, the assessment will provide PCMC the opportunity to monitor and verify that the proposed institutional controls are effective on a per lot basis. The discovery of situations that pose an increase exposure risk would require the owner to implement corrective actions within a reasonable time period. Park City would institute ordinance language that mandates corrective actions and a reasonable time period for completion. **Continued non-compliance and refusal to implement corrective actions would be classified as a Class B Criminal Misdemeanor.** The ordinance would require follow-up procedures on non-compliant properties in order to verify that the situation was remedied. PCMC and a Home Owners Association delegate in addition to a regulatory agent would represent the assessment team. If a regulatory representative (UDEQ or USEPA) could not participate in the assessment the PCMC and Home Owners Association representative would complete the evaluation and provide the report to the regulatory representative of the findings. The frequency of the assessment will be conducted every 5-years, however if the results within a particular area are not favorable the frequency would be reduced to every 2 years.

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**Figure 3 Assessment Areas**

## 4.1.3 Assessment Areas

In order to conduct a comprehensive annual assessment the areas will be divided into 6 Areas. Since Areas 5 and 6 are within the expanded area, these properties have yet to be digitized and inventoried. However, as the lots are sampled these properties will be digitized and plotted for historical purposes.

Figure 3 represents the assessment areas and the streets within the boundaries have been identified in the following table:

Area 1 and Streets <sup>5</sup>	Area 2 and Streets <sup>6</sup>	Area 3 and Streets <sup>7</sup>	Area 4 and Streets <sup>8</sup>	Area 5 and Streets <sup>9</sup>	Area 6 and Streets <sup>10</sup>
Doc Holliday	Monarch	Belle Starr	Sidewinder	Expanded Area	Expanded Area
Little Bessie	Little Bessie	Geronimo Court	Gold Dust Lane	Refer to Tab 8	Refer to Tab 9
Samuel Colt	Ina Avenue	Annie Oakley	Prospector Avenue		
Sidewinder	Sunrise Circle	Lily Langtry Court	Poison Creek Lane		
Buffalo Bill	Comstock	Wyatt Earp Way	Bonanza Drive		
Butch Cassidy	Calumet Court	Kearns	Kearns		
Wyatt Earp Way	Kearns				
Cochise Court					
Kearns					

## 4.1.4 Assessment Components

The assessment would focus on the following components:

- 5 Refer to Tab 3 for specific lots.
- 6 Refer to Tab 4 for specific lots.
- 7 Refer to Tab 5 for specific lots.
- 8 Refer to Tab 6 for specific lots.
- 9 Refer to Tab 8 for streets within area.
- 10 Refer to Tab 9 for streets within area.

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- Inspections of capped lots to ensure the integrity of the cap is being maintained.
- Inspection of the vegetation or other controls (i.e. rock, pavement) for maintaining the cap.
- Evaluate the potential of soils migrating off location and impacting surface waters.
- Landscaping or other activities that intrude on the cap.
- XRF Field Sampling for front, back, and side yards.

## 4.1.5 Assessment Checklist<sup>11</sup>

While conducting the assessment a comprehensive checklist will be completed to document the results of the inspection. The report will be retained in PCMC Environmental Department and would be made available to regulatory agencies upon request. Furthermore, the results will be entered into Park City's Environmental Database in order to maintain a historical perspective of the assessments. Lots that are deemed out of compliance with the ordinance would be given a copy of the checklist and a notice regarding the issues that resulted in the loss of compliance. In addition, a time frame would be specified on when the corrective actions are to be completed.

## 4.1.6 Assessment XRF Field Sampling

In an effort to obtain verification data to determine if the cap has been effective in containing underlying material, a voluntary field-sampling program will be offered to existing and new property owners. The sampling will be conducted during the assessment and will be scheduled the winter prior to completing the area. For those property owners whom agree to the sampling, a composite sample will be procured from the front, back, and side yards and analyzed with a portable x-ray fluorescence (XRF) instrumentation. PCMC will pursue a goal of sampling at least 10% of the capped lots within a given area during the assessment. If additional lots can be sampled, thereby exceeding the 10% goal those lots will also be sampled. PCMC will pursue the ultimate goal of sampling all capped lots within a given area to improve upon the dataset. For property transfers, PCMC will offer to the Seller and Buyers free sampling of the lot, to provide assurances the cap has been effective in containing underlying lead levels. Upon finalizing this proposal a Standard Sampling Protocol will be drafted and will be an exhibit to this proposal.

The XRF results will be compiled and placed within a database as a record for each property sampled. Furthermore, the results will be supplied to the property owner for awareness. In the event, the results exceed 1000-ppm total lead, a split sample will be submitted to a state certified laboratory and analyzed for total lead under Method SW-846 6010. If the results are verified by the state certified laboratory, additional XRF sampling will be completed to identify the specific area exhibiting elevated lead concentrations. Once that area is identified, the owner will have to remedy the area. Properties that have a lot average of all four samples of <1000 ppm lead, will be considered compliant.

However, if the lot does exhibit lead exposure risks because of elevated lead concentration >1000 ppm and is being neglected, corrective actions will be required by the property owner. Currently, the ordinance requires that the cap be maintained; the assessment will result in further identification of properties that require corrective actions. It should be noted that this is a very

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<sup>11</sup> Tab 7 Contains the Proposed Checklist

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important component to the EMS as it will be used by USEPA for determining if the cap has been effective, therefore justifying the removal of this site from CERCLIS. Participation by the property owners to volunteer their property for screening is essential for an adequate data set to be compiled. In order to develop a valid data set, each area will need a substantial amount of volunteers for the XRF soil screening. Before the assessment is completed the property owners within the respective area will be contacted and asked for permission to conduct the XRF sampling. During the assessment, those property owners that have agreed to the XRF sampling, and have a cap installed, will be evaluated.

### **4.2     *Soil Ordinance Resident Notices*<sup>12</sup>**

Residents of the Soil Ordinance area will be given information about the exposure of heavy metals and an analytical report of the sampling activity that has been conducted on the lot. The purpose of this notice is to increase the public awareness, of the importance of maintaining the cap.

### **4.3     *Lots Without Certificate of Compliance Strategy***

Lots that are on record of not being capped, during the existence of the ordinance will be sampled and characterized to determine the current compliance status of the lot. The site characterization sampling for these lots will be mandatory; therefore a major revision to the ordinance will have to be made for this provision. Lots that exhibit elevated lead levels will need to comply with either the 1000 ppm lead for "existing landscaping" or 200 ppm lead standard for "new landscaping" (dependent on when the house was landscaped).

PCMC will pursue the goal of capping 15 properties per year that exhibit elevated lead levels for all areas within the ordinance. PCMC will offer compliance sampling at no charge for the remaining properties. Refer to Figure 2, lots projected in black are absent the "Certificate of Compliance" and have either been characterized and not capped or not sampled and not capped. PCMC will consider these properties a priority in seeing both lot classifications being capped. Finally, any lots that currently have analytical evidence on file, which exceeds the ordinance level, must be capped by December 2003. In the event the property is not capped after that date the city will seek legal enforcement of the ordinance.

### **4.4     *Corrective Action Loan Program***

In order to assist property owners that cannot financially afford re-landscaping their property and capping the lot. PCMC will offer a 7-year loan program that the property owner can utilize to pay for the corrective actions to their property. This will be an incentive to assist financially strapped property owners in capping properties.

## **5.0     EDUCATION AND PUBLIC OUTREACH**

Because a very important component of this EMS is public awareness, PCMC will design educational materials to explain to residents of the Ordinance area what they can do, to protect themselves from the dangers of lead. This training will be presented in brochures<sup>13</sup> and other media in order to increase awareness to the public residing within the Ordinance area.

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<sup>12</sup> Tab 8 Contains Proposed Sample Report

<sup>13</sup> Tab 10 Lead Management Strategies for Prospector Homeowners

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## 5.1.0 Soils Issues

The awareness campaign will include informing the public of Park City's mining history and the by-products that were generated from this activity. In addition, the training program will explain the amounts of lead that could be found within the soils in the Soils Ordinance Area. This component will explain the ordinance controls for controlling and minimizing the dangers associated with lead impacted soils.

### 5.1.1 Lead Type and Associated Health Risks

The training and awareness program will also address the health risks of ingesting lead media. This portion of the training will include defining the symptoms, effects, and health risks of lead poisoning.

### 5.1.2 Residential Best Management Practices

Best Management Practices will be specified within the training to make the public aware of how the risk can be reduced. The training module will include the following:

- Importance of maintaining the cap.
- How to minimize exposed soil areas.
- How to replace soils back into excavations and cap with clean topsoil.
- Importance of vegetating the lot.
- Importance of prohibiting infants from eating soils or playing in dirt.
- Importance of washing hands and clothes thoroughly after landscaping activities.
- Importance of not wearing boots after yard work within the living area of the house.
- Importance of washing of any fruits or vegetables produced from a garden.
- Importance of not over watering to prevent sediment migration.

### 5.1.3 Landscaping Specifications<sup>14</sup>

This portion of the training will include PCMC's landscaping specifications. The following will be included within the description of this module:

- Landscaping and gardening above grade.
- Landscaping and gardening below grade.
- Specification for planting of trees or shrubs.
- Removing potentially regulated soils from the lots.

### 5.1.4 Exporting Soil Characterization and Disposal Requirements

This section will include explaining potential regulatory authority, in the event an owner decides to remove soil from the property. It would include the explanation of Resource Conservation and Recovery Act and how soils being removed from location could be potentially regulated under this law. Furthermore, additional information will be provided on the landfills permitted which are permitted accept this material.

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<sup>14</sup> Tab 9 Represents Park City Landscaping Specifications



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## 5.1.5 Summit County Lead Screening Services

Summit County provides free lead screening for adults and parents who wish to test their children for blood lead. As a result, the Educational Component will make parents aware of this service and the locations, which the testing can be done. Summit County works very closely with the Utah State Health Department and the Utah Blood Lead Registry. The testing is conducted using the "finger prick" method and in the case elevated levels are observed arterial blood is drawn.

For parents that wish to test their children for blood lead, PCMC will agree to reimburse them for the testing providing the results are supplied to the City and entered into a database for an historical perspective. In the event of a high-test result, PCMC will work cooperatively with Summit County and the State Health Department to discover the origin of the lead. PCMC will rely on the Utah Department of Health and Summit County contingency program for investigating blood lead contact scenarios.

## 5.2 *Presentation Media*

The presentation of this information could be conveyed in the following media formats:

- Internet ([www.parkcity2002.com](http://www.parkcity2002.com))
- Informational Pamphlets and Brochures.
- Conveyed by Real Estate Agents.
- Library
- City Hall
- Building and Planning Departments.

## 5.3 *Reports on Sampling History of Lots<sup>15</sup>*

For the assessment areas, which are inspected, the property owners will be given a historical report, which documents the lot's compliance history. This information will include sampling events that occurred before the lot was capped and after the lot was capped. Furthermore, this report will also include the associated health risks with the underlying constituents contained by the cap. In addition, the report will identify locations for blood lead testing services.

## 5.4 *New Residents Orientation*

New residents will be given a comprehensive brochure that documents health risks, environmental, and ordinance issues that within the Ordinance area.

## 5.5 *Real Estate Agent Orientation*

Real Estate owners will be provided with an annual workshop to make them aware of the ordinance and regulatory standards. Informational brochures will be presented at the workshop with the intent of the information being conveyed to potential homeowners.

## 5.6 *Renters Orientation*

Properties, which are currently being rented, will be given educational informational material to

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15. Tab 8 Contains Proposed Lot Report

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increase awareness. This information will be sent annually to the residence and will specify the Ordinance requirements for the unit they are renting.

### **5.7     *Lead Awareness Campaign to Local Physicians***

Local physicians will be contacted and provided with information on the historical mining impacts of the area and the potential for lead exposure to children. They will be encouraged to test for blood lead on children and utilize the State Blood Registry as a reporting mechanism.

## **6.0     PROSPECTOR SAMPLING RECORDS AND DATA**

PCMC will develop a comprehensive database to track lot compliance and analytical results. The Environmental Department will maintain this database and generate an annual report to regulatory agencies requesting information.

### **6.1     *Prospector Soil Tracking Contingencies***

In order to minimize the risks of the improper disposal of soils exhibiting elevated levels of lead, the Park City Building Department will add to the plan checklist the requirement of a "Disposal Facility Acceptance Letter". During the plan check for projects within the Ordinance area, if it appears soils are going to be generated during the construction this letter will be required to validate proper disposal. Upon receiving this documentation the property will be eligible for "Certificate of Occupancy". Currently, the ordinance requires generated soils that exceed 1000-ppm lead be managed and disposed of as a hazardous waste. Nonetheless, Park City believes that soils exhibiting these characteristics should also have documentation that verifies the material is disposed of within a permitted landfill. It should also be noted that for the property to be eligible for the "Certificate of Occupancy" cap compliance must be verified by Park City by sampling and gauging the depth of the cap. In the event, the cap is compliant; a "Certificate of Compliance" is issued for the property.

# Draft

## TAB REFERENCE

*Tab 1 – Robert Duprey, Director of Hazardous Waste Management Division letter dated July 28<sup>th</sup> 1988*

*Tab 2 – Chapter 15 Park City Landscaping and Maintenance of Soil Cover 11-15-1*

*Tab 3 – Area 1 Inspection Zone and Address List*

*Tab 4 – Area 2 Inspection Zone and Address List*

*Tab 5 – Area 3 Inspection Zone and Address List*

*Tab 6 – Area 4 Inspection Zone and Address List*

*Tab 7 – Area 5 Inspection Zone and Street List*

*Tab 8 – Area 6 Inspection Zone and Street List*

*Tab 9 – EMS Inspection Checklist*

*Tab 10 – Resident Lot Sample Report*

*Tab 11 – Landscaping Specifications*

*Tab 12 – EPA and PCMC Educational Lead Awareness Pamphlet (Has yet to be developed)*

*Tab 13 – Soils Ordinance Boundary Map*

*Tab 14 – Expanded Area Lots that have been sampled.*

*Tab 15 – Stakeholder Distribution List*